

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**ROGER KNOX, WINTERCAP S.A.,
MICHAEL T. GASTAUER, WB21 US
INC., SILVERTON SA INC., WB21 NA
INC., C CAPITAL CORP.,
WINTERCAP SA INC. AND B2 CAP
INC.**

Defendants.

**RAIMUND GASTAUER, SIMONE
GASTAUER FOEHR, AND B21 LTD.**

Relief Defendants.

**Civil Action No. 18-CV-____
()**

DECLARATION OF TREVOR T. DONELAN

I, Trevor T. Donelan, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. Since September 2014, I have been employed as an Enforcement Accountant with the U.S. Securities and Exchange Commission (“the Commission”) in its Boston Regional Office. My duties include conducting investigations relating to potential violations of the federal securities laws.

2. I received a Bachelor of Science degree in business administration, with a concentration in accounting, from the University of Richmond in Virginia in 2000. Before joining the Commission, I was most recently a managing director in the forensic accounting and complex business litigation unit at StoneTurn Group, LLP (“StoneTurn”), in Boston, where I worked for over seven years. Before joining StoneTurn, I held forensic accounting

and auditor positions for a total of approximately seven years with Deloitte Financial Advisory Services LLP, and Arthur Andersen LLP, both in Boston.

3. I am a Certified Public Accountant in the Commonwealth of Massachusetts, and a Certified Fraud Examiner by the Association of Certified Fraud Examiners. I am also Certified in Financial Forensics by the American Institute of Certified Public Accountants.

4. I make this Declaration based upon my personal knowledge and upon information and belief as set forth below, and in support of the Commission's Emergency *Ex Parte* Motion for a Temporary Restraining Order, Order Freezing Assets, and Order for Other Equitable Relief.

5. On or about February 9, 2017, I became actively involved in the Commission's investigation into possible violations of the federal securities laws by Roger John Irvine Knox ("Knox"), Wintercap SA (f.k.a. Silverton SA from at least June 2015 and through approximately February 2018, referred to as "Wintercap SA" in this declaration), and other affiliated businesses. Based on bank and brokerage records, Wintercap SA purports to be an asset manager, based in Finhaut, Switzerland. Knox is the sole director and owner of Wintercap SA.

6. In the course of that investigation, I reviewed documents and data produced to the Commission and attended witness interviews and testimony. The purpose of this declaration is to relay certain information that the Commission has gathered about the defendants through interviews and testimony of certain witnesses and the review and analysis of certain documents.

7. The principal sources of documentation produced to the Commission that I have relied upon for this declaration include, but are not limited to:

- a. Transfer agent records for certain public company issuers held by and/or traded by Wintercap SA.
- b. Trading data collected by the Commission for certain public company issuers held by and/or traded by Wintercap SA (referred to as “Blue Sheet Data”).
- c. Brokerage records for Wintercap SA accounts held at domestic and foreign broker-dealers including the following (collectively, the “Wintercap Brokerage Accounts”):
 - i. Wedbush Securities, Inc. (United States),
 - ii. Forte Securities, LLC (United States),
 - iii. Lombard Forte Securities, Ltd. (United Arab Emirates),
 - iv. Prometheus Capital Finance, Ltd. (United Arab Emirates),
 - v. Tendall Capital Markets, Ltd. (Malta),
 - vi. Forte Securities, Ltd. (United Kingdom),
 - vii. Valbury Capital, Ltd. (United Kingdom),
 - viii. Linear Investments, Ltd. (United Kingdom),
 - ix. ADM Investor Services, Ltd. (United Kingdom), and,
 - x. Interactive Brokers UK, Ltd. (United Kingdom).
- d. Banking records for Wintercap SA accounts held at the following foreign banks (collectively, the “Wintercap SA Foreign Bank Accounts”):
 - i. Baltikums Bank AS (Latvia),
 - ii. AfrAsia Bank Limited (Mauritius),
 - iii. MauBank, Ltd. (Mauritius), and,
 - iv. Bank of Montreal (Canada).

e. Banking records for U.S. accounts controlled by Michael T. Gastauer (Gastauer), or a member of his family, who operates a “virtual bank” network referred to herein as WB21. Since late 2015, Gastauer incorporated several U.S. corporations and established bank accounts for each, including the following (collectively, the “Gastauer Accounts”):

Gastauer Corporations	Bank Accounts
Silverton SA, Inc. Incorporated August 2016	Citibank Wells Fargo JP Morgan Chase
WB21 US, Inc. Incorporated October 2015	Citibank Wells Fargo JP Morgan Chase
WB21 NA, Inc. Incorporated August 2016	JP Morgan Chase Savings Bank of Walpole TD Bank Bank of America
C Capital Corp. Incorporated November 2016	Citibank JP Morgan Chase
Wintercap SA, Inc. Incorporated April 2018	Citibank TD Bank
B2 Cap, Inc. Incorporated April 2018	Citibank TD Bank

- f. Gastauer was (and, based on records I have reviewed, still is) the owner and operator of WebBank 21 Group or WB21 Group through WB21 Limited, which purports to be a virtual bank that offers a solution to “streamline” customers through the banking “know-your-customer” requirements.
- g. Brokerage records for individuals that purchased stock of certain issuers during the time that Wintercap SA was selling.

8. I have been asked by counsel for the Commission to summarize certain transactions involving Wintercap SA and Gastauer, including:

- a. Wintercap SA's receipt, deposits and sale of certain public company's stock, including Environmental Packaging Technologies Holdings, Inc. ("Environmental Packaging"); CURE Pharmaceuticals Holding Corp. ("CURE"); and Garmatex Holdings, Ltd. ("Garmatex");
- b. Wintercap SA's the movement of cash among the Wintercap Brokerage Accounts, Wintercap Foreign Bank Accounts and the Gastauer Accounts.

Environmental Packaging

9. I have reviewed Commission filings concerning Environmental Packaging, which reflect the following:
 - a. Environmental Packaging is a publicly traded company that was incorporated in Nevada in 2011.
 - b. On or about June 21, 2017, Environmental Packaging filed a Form 8-K with the Commission announcing a merger, and disclosed “securities ownership of certain beneficial owners and management,” including “5% Shareholders” based on approximately 61 million outstanding shares of Environmental Packaging stock as of June 9, 2017.
 - c. Environmental Packaging filed a registration statement with the Commission on or about July 12, 2012. This registration statement was amended on or about August 24, 2012 and September 11, 2012. This registration statement and related amendments concerned the original issuance of 975,000 shares of Environmental Packaging stock. After the initial issuance of this stock, Environmental Packaging executed two forward splits of its common stock which increased the number of shares registered in this registration statement to approximately 5.3 million shares. Neither Environmental Packaging nor any person filed additional registration statements between September 2012 and Present.
10. I have reviewed emails and other documents concerning Environmental Packaging, which reflect the following:

- a. In or about August 2013, an individual referred to herein as Individual A acquired, directly or indirectly, substantially all of the stock of Environmental Packaging.
- b. From approximately August 2013 through at least June 2017, documents and witness statements reflect Individual A made management and other corporate decisions concerning Environmental Packaging after taking possession of the company's stock.
- c. Individual A held his Environmental Packaging stock in one or more entities, including entities incorporated internationally. Environmental Packaging did not disclose Individual A as a 5% shareholder in its June 2017 Form 8-K.
- d. Individual A also coordinated with a lawyer, Individual B, to help sell Individual A's stock.
- e. By approximately April 2017, Individual A, directly or indirectly, engaged Knox to sell his stock.
- f. In or about April 2017, Individual A, directly or indirectly, and with Individual B's assistance, transferred more than 10% of Environmental Packaging's issued and outstanding stock to Knox via Wintercap SA.
- g. In or about April and May 2017, Knox, through Wintercap SA, subsequently deposited Individual A's stock in at least three brokerage firms as follows:
 - i. On or about April 12, 2017, Wintercap SA deposited approximately 2.7 million shares of Individual A's Environmental Packaging stock with Broker A; and

- ii. On or about April 27, 2017, Wintercap SA deposited another approximately 2.6 million shares of Individual A's Environmental Packaging stock with Broker B; and
 - iii. On or about May 3, 2017, Wintercap SA deposited another approximately 2.6 million shares of Individual A's Environmental Packaging stock with Broker C. *Attached hereto as Exhibit A is Broker C's "Deposit Securities Request" form, which Knox signed.*
- h. On or about May 19, 2017, Individual B emailed Knox about creating an entity for purposes of paying for a promotional campaign concerning Environmental Packaging.
 - i. On or about May 22, 2017, Knox emailed the following to Individual B: "[a]s discussed, the amended Marshall Island company name Svarna Ltd is available and incorporation has been requested today."
 - j. Shortly thereafter, Individuals A and B caused Environmental Packaging to transfer approximately \$1 million to Wintercap SA, which in turn transferred approximately \$1 million to a stock promoter on behalf of "Svarna."
 - k. The average daily trading volume of Environmental Packaging's stock during May 1, 2017, through June 9, 2017 (a Friday), was less than 23,000 shares per day, and on most days during that period of time, Environmental Packaging's stock did not trade at all in the public securities markets.
 - l. On or about June 12, 2017, which I believe to be the first the first day of a paid promotional campaign, approximately 424,956 shares of Environmental Packaging traded in the public securities markets. That day, Wintercap SA

sold approximately 114,000 shares of Environmental Packaging stock into the public securities markets to investors.

- m. On or about June 13, 2017, approximately 226,263 shares of Environmental Packaging traded in the public securities markets. That day, Wintercap SA sold approximately 66,000 shares of Environmental Packaging stock into the public securities markets to investors. And, between approximately June 14 and 27, 2017, Wintercap SA sold approximately 567,000 additional shares of Environmental Packaging stock into the public securities markets.
- n. Wintercap SA's sales of Individual A's Environmental Packaging stock in June 2017 generated approximately \$1.3 million in trading proceeds.

CURE

11. I have reviewed Commission filings concerning CURE, which reflect the following:
 - a. CURE is a publicly traded company that was incorporated in Nevada in 2014.
 - b. On or about April 17, 2017, CURE filed a Form 10-K with the Commission announcing a merger, and disclosed “securities ownership of certain beneficial owners and management,” including “5% Shareholders” based on approximately 23 million outstanding shares of CURE stock as of December 31, 2016.
 - a. CURE filed a registration statement with the Commission on or about June 10, 2015. This registration statement was amended on or about August 5, 2015, August 19, 2015, and August 25, 2015. This registration statement and related amendments concerned the offer of 5,000,000 shares of CURE stock. CURE sold approximately 1,940,000 pursuant to this offer during 2015. After the initial issuance of this stock, CURE executed a forward split of its common stock which increased the number of shares issued pursuant to this registration statement to approximately 7 million shares. Neither CURE nor any person filed any further registration statements between August 2015 and December 31, 2017.
12. I have reviewed emails and other documents concerning CURE, which reflect the following:

- c. In or about June 2016, Individual A acquired, directly or indirectly, substantially all of the stock of CURE.
- d. From approximately June 2016 through at least June 2017, Individual A made management and other corporate decisions concerning CURE after taking possession of the company's stock.
- e. Individual A held his CURE stock in one or more entities, including entities incorporated internationally. CURE did not disclose Individual A as a 5% shareholder in its public filings.
- f. Individual A also coordinated with Individual B, to help sell Individual A's stock.
- g. In or about February 2017, Individuals A and B, directly or indirectly, engaged Knox to sell his stock and transferred more than 10% of CURE's total issued and outstanding shares to Wintercap SA. More specifically, on or about February 7, 2017, Individual B sent Knox an email about three entities that would be used to deposit and sell CURE stock through Wintercap SA.
- h. In or about March and April 2017, Knox, through Wintercap SA, subsequently deposited Individual A's stock in at least two brokerage firms as follows:
 - i. On or about March 3, 2017, Wintercap SA deposited approximately 1.1 million shares of Individual A's CURE stock with Broker A; and

- ii. On or about March 3, 2017, Wintercap SA deposited another approximately 982,202 shares of Individual A's CURE stock with Broker C; and
 - iii. On or about March 16, 2017, Wintercap SA deposited another approximately 1.0 million shares of Individual A's CURE stock with Broker A. *Attached hereto as Exhibit B is Broker C's "Equity Authentication Form" form, which Knox signed.*
- i. Between approximately March 10 and 21, 2017, Wintercap SA sold approximately 147,647 shares of CURE stock.
 - j. Wintercap SA's sales of Individual A's CURE stock in June 2017 generated approximately \$1.0 million in trading proceeds.

Garmatex Holdings, Ltd.

13. I have reviewed Commission filings concerning Garmatex, which reflect the following:

- a. Garmatex is a publicly traded company that was incorporated in Nevada in 2014.
- a. Garmatex filed a registration statement with the Commission on or about June 20, 2014. This registration statement was amended on or about July 25, 2014, and August 7, 2014. This registration statement and related amendments concerned the original offer of 1,700,000 shares of Garmatex stock. Garmatex sold approximately 1,200,000 pursuant to this offer during 2014. After the initial issuance of this stock, Garmatex executed a forward split of its common stock which increased the number of shares issued pursuant to this registration statement to approximately 15 million shares. The purchasers (“S-1 Shareholders”) of this stock paid \$9,000 total to acquire these shares in cash, at the same bank in Mexico, at or about the same time. Neither Garmatex nor any person filed any further registration statements between August 7, 2014 and December 31, 2017.

14. I have reviewed emails and other documents concerning Garmatex, which reflect the following:

- a. On or about September 11, 2014, Garmatex’s board of directors directed Garmatex’s transfer agent to send all of the share certificates initially issued to S-1 Shareholders to a law firm based in Nevada.

- b. On or about February 28 and March 16, 2017, one or more persons transferred a total of 5,250,000 shares of Garmatex stock to offshore entities. One or more persons divided the transfers into three equal parts, transferring 1,750,000 to each of the three separate offshore entities.
- c. On or about the same days, one or more persons caused the offshore entities referenced in Paragraph __ above to transfer 5,250,000 shares of Garmatex stock to Wintercap SA.
- d. By approximately March 31, 2017, Wintercap SA sold all of the stock referenced in Paragraph __, above.
- e. In or about April 2017, one or more persons transferred additional stock to Wintercap SA, most of which Wintercap SA subsequently sold in or about April and May 2017.
- f. Wintercap SA's sale of Garmatex stock between March and May 2017 generated over \$5 million in proceeds.

Wintercap SA Cash Flow

15. Wintercap SA maintains omnibus brokerage accounts in its own name around the world including the Wintercap SA Brokerage Accounts listed above as well as other foreign accounts for which the Commission has not yet obtained records.

16. Based on my review of records from the Wintercap SA Brokerage Accounts, Wintercap SA rarely buys securities in its omnibus accounts. Since at least late 2015, Wintercap SA frequently deposits large blocks of microcap securities which it subsequently sells principally into the U.S. markets. Wintercap SA then transfers the cash generated from these sales to the Wintercap SA Foreign Bank Accounts or the Gastauer Accounts.

17. In or about June 2016, Wintercap SA sought to transfer money to WB21 US Inc., but a broker rejected the request. In or about August 2016, Gastauer established Silverton SA, Inc. , and subsequently opened bank accounts using this corporate name, the vast majority of cash withdrawals afterwards from the Wintercap SA Brokerage Accounts have been directed to the Silverton SA, Inc. accounts in the U.S. However, based on the records I reviewed, Wintercap SA did not include “Inc.” when it transferred money from its brokerage account (i.e., formerly held in the name of “Silverton SA”) to Gastauer’s bank accounts (i.e., held in the name of “Silverton SA, Inc.”).

18. Between October 2015 and the date of this declaration, I have traced approximately \$165.0 million of cash proceeds from Wintercap SA brokerage accounts to the Wintercap SA Foreign Bank Accounts or the Gastauer Accounts as summarized below and in Exhibits C, D and E to this declaration. Based on my review of available brokerage records, Wintercap SA sold stock and generated net trading proceeds of at least \$100,000 on over 50 different issuers totaling approximately \$116.6 million of the \$165.0 million.

Brokerage Firm Country	Silverton Trading Proceeds
United Kingdom	\$ 58,869,672
United States	49,425,201
Malta	24,595,251
United Arab Emirates	22,170,131
Canada	6,021,389
Mauritius	3,908,850
Total	\$ 164,990,495

19. Of the \$165.0 million of cash received from Wintercap SA's brokerage accounts, approximately \$46.5 million was deposited into the Wintercap SA Foreign Bank Accounts and the remaining \$118.5 million was deposited into the Gastauer Accounts for the benefit of Wintercap SA. However, I have reviewed email correspondence between Gastauer and bank representatives, and recorded telephone conversations involving Gastauer and bank representatives, in which Gastauer represented in sum and substance that the accounts he opened were for his own benefit.

20. Based on my review of the bank records for the Gastauer Accounts, which have received the vast majority (over 87%) of the Wintercap SA proceeds since September 2016, most of the disbursements from the accounts are made to bank accounts in foreign countries. The table below summarizes outgoing wires from the Gastauer Accounts held at Citibank for the top 15 foreign countries:

FOREIGN COUNTY	OUTGOING WIRE TRANSFERS
CANADA	\$ 26,594,088
MEXICO	16,567,870
PHILIPPINES	12,462,304
UNITED KINGDOM	10,538,697
SWITZERLAND	6,452,421
HONG KONG	3,573,237
UNITED ARAB EMIRATES	3,348,882
PANAMA	3,271,020
SINGAPORE	2,587,246
GIBRALTAR	1,786,562
GERMANY	1,720,084
LIECHTENSTEIN	1,691,218
CAYMAN ISLANDS	612,000
JAPAN	512,821
POLAND	456,499
TOTAL	\$ 92,174,948

Wintercap SA Ownership Concentration

21. I reviewed records obtained from transfer agents for several public company issuers whose stock was held by and/or traded by Wintercap SA. Based on my review, the typical process by which Wintercap SA deposited these shares into its omnibus brokerage accounts first included the transfer or assignment of the shares into Wintercap SA's name. That is, Wintercap SA typically became the record owner of the shares prior to the transfer of the shares to its brokerage firms.

22. For the 18 issuers listed in the table below, using the transfer agent records, I was able to trace the transfer of shares into Wintercap SA's control.¹ The table reflects the date that shares were first transferred to Wintercap SA, the number of nominees (entities or individuals) which transferred the shares to Wintercap SA, and the total number of shares transferred to Wintercap SA which were converted into electronic format by depositing the certificate with the Depository Trust & Clearing Corporation ("DTCC"). Once Wintercap SA's shares were deposited with DTCC, they are available to be traded electronically ("Shares Available for Trading").

23. I also used the records obtained from the transfer agents to determine the balance of Shares Available for Trading as of Wintercap SA's latest deposit to DTCC and I calculated the percentage of Shares Available for Trading transferred to and deposited by Wintercap SA.

24. Finally, using records obtained from Wintercap SA foreign and domestic omnibus brokerage accounts, I calculated the amount of trading proceeds generated by Wintercap SA from selling stock in these issuers based on available brokerage records,

¹ I reviewed correspondence where Knox demonstrated, in sum and substance, that his business model is to trade in Wintercap SA's name, not the underlying beneficial owners. See *Exhibit F attached hereto*.

which approximated \$64.8 million in the aggregate. This estimate represents the minimum amount of proceeds because there are Wintercap SA brokerage accounts for which the Commission has not yet received complete trading records.

Issuer	Date of First Transfer to Wintercap SA	Nominees Used To Aggregate Shares	Cumulative Wintercap SA Shares Available for Trading	Total Shares Available for Trading As of Last Wintercap SA Deposit	Wintercap SA Percentage of Shares Available for Trading	Minimum Gross Proceeds to Wintercap SA
ARSN	8/4/2016	3	11,025,000	21,150,000	52.1%	\$ 938,224
CURR	3/3/2017	3	3,091,802	5,729,810	54.0%	\$ 1,031,048
DIGAF	9/7/2016	14	15,910,000	18,581,781	85.6%	\$ 4,001,095
DVGG / RETC	6/13/2017	3	18,366,018	18,416,592	99.7%	\$ 8,371,665
ENVV	6/16/2015	5	18,250,000	29,986,500	60.9%	\$ 4,155,097
GLBB	4/25/2017	2	900,000	1,365,000	65.9%	\$ 752,230
GRMX	3/13/2017	5	7,233,337	13,858,337	52.2%	\$ 5,016,997
ORRP	4/29/2016	5	11,050,000	14,999,500	73.7%	\$ 7,853,086
EPTI	4/12/2017	3	7,833,344	8,050,423	97.3%	\$ 1,310,751
GLLK	10/28/2015	4	9,900,000	26,400,351	37.5%	\$ 1,601,076
NEWG	8/10/2016	3	3,600,000	6,800,000	52.9%	\$ 1,929,147
PSCR	6/27/2016	7	15,359,998	17,909,998	85.8%	\$ 3,781,011
PSNP	10/5/2015	2	6,676,450	27,855,450	24.0%	\$ 1,960,469
SPRN	2/28/2017	4	11,450,000	21,691,615	52.8%	\$ 1,326,243
SRUP	11/16/2016	6	10,446,672	10,763,339	97.1%	\$ 2,727,225
UMFG	3/31/2017	4	19,250,000	22,291,754	86.4%	\$ 1,918,749
VBIO	6/3/2015	20	8,837,065	19,622,915	45.0%	\$ 11,773,801
ZENO	9/27/2016	3	4,432,050	10,924,836	40.6%	\$ 4,362,333
TOTAL						\$ 64,810,246

25. I analyzed trading in the Table above as follows:

- a. For each of the issuers listed in the table above, I searched filings made with the Commission and found that no person or entity associated with the issuers filed any Forms 144 with the Commission.
- b. I also analyzed the stock sold by Wintercap SA over certain three month periods for each issuer identified in the table above, and I determined that, with one exception, Wintercap SA sold more than 1% of each issuers' disclosed issued and outstanding shares during the relevant three month period. The one exception is Wintercap SA's sale of CURE stock. In the instance of the CURE, Individual A divided his sales of stock between

Wintercap SA and another offshore asset manager, but Individual A's sales through the two entities were greater than 1% of CURE's issued and outstanding shares.

- c. I searched the public filings, including registration statements, of each issuer for the name of certain entities for whom Wintercap SA sold stock. The purpose of my search was to assess whether any public registration statements disclosed the names of certain entities as selling shareholders. With one exception, I did not observe any of the entities subject to my search in the filings of the companies identified in the table above. The one exception concerns the company Vitality Biopharma, Inc. (Ticker: VBIO), where I did observe a registration statement (and related amendments) filed in 2016 identifying one or more entities for whom Wintercap SA sold VBIO stock. However, I did not find a "Notice of Effectiveness" concerning the 2016 registration statement or related amendments.

26. Records I have reviewed indicate that Wintercap SA was due to earn 6% of its stock sale proceeds.

Trading Records Review

27. I reviewed Blue Sheet Data for three issuers included in the table above to identify individuals who purchased stock while Wintercap SA was selling into the market. I identified individual investors who purchased shares in these issuers during the duration of Wintercap SA's selling activity and who, based on the Blue Sheet Data, had more purchases than sales of the stock during the time period. At the direction of Commission counsel, I also identified individuals from Massachusetts that bought shares of the issuers during this time period. A summarization of my findings is set forth below:

28. **Cure Pharmaceutical Holdings Corp (CURR)** – Trading records from Wintercap SA brokerage accounts show Wintercap SA sold CURR stock between March 10, 2017 and March 21, 2017. Based on Blue Sheet Data, I identified approximately 78 brokerage accounts in the name of individual account holders who purchased more than 500 shares of CURR stock than they sold during this time period. In total, these accounts spent over \$1.9 million to acquire approximately 273,000 shares of CURR during this time period.

29. I also identified four brokerage accounts with account holders based in Massachusetts that purchased more CURR stock than they sold during this time period, spending approximately \$6,000 to acquire 750 shares of CURR stock.

30. **Environmental Packaging Technology Holdings, Inc. (EPTI)** – Trading records from Wintercap SA brokerage accounts show Wintercap SA sold EPTI stock between June 9, 2017 and June 27, 2017. Based on Blue Sheet Data, I identified approximately 78 brokerage accounts in the name of individual account holders who purchased more than 500 shares of EPTI stock than they sold during this time period. In

total, these accounts spent over \$1.0 million in net trading cost to acquire approximately 596,000 shares of EPTI.

31. I also identified nine brokerage accounts with account holders based in Massachusetts that purchased more than 500 shares of EPTI stock than they sold during this time period, spending approximately \$25,000 to acquire 18,050 shares of EPTI stock during this time period.

32. **Garmatex Holdings, Ltd. (GRMX)** – Trading records from Wintercap SA brokerage accounts show Wintercap SA sold GRMX stock between March 14, 2017 and May 2, 2017. Based on Blue Sheet Data, I identified approximately 218 brokerage accounts in the name of individual account holders who purchased more than 5,000 shares of GRMX stock than they sold during this time period. In total, these accounts spent approximately \$6.4 million in net trading cost to acquire approximately 8.5 million shares of GRMX during this time period.

33. I reviewed the brokerage records for the largest purchaser of GRMX shares during this time period. This individual, a resident of South Carolina, purchased 3,000,000 shares of GRMX using two accounts at Fidelity Brokerage Services during March 2017 spending \$2,095,700.35. I participated in an interview of this investor who explained that he was a victim of an aggressive cold call promotional campaign. I reviewed phone records obtained from the boiler room phone service which corroborated the witness' statements.

34. Using the Blue Sheet Data, I also identified 25 brokerage accounts with account holders based in Massachusetts that purchased more than 1,000 shares of GRMX stock than they sold during this time period, spending approximately \$182,000 to acquire 275,274 shares of GRMX stock.

Relief Defendants

35. Gastauer also transferred, directly or indirectly, millions of dollars of Wintercap SA's stock sale proceeds to the Relief Defendants. Based on my review of documents, none of the Relief Defendants appear to be employed by, or had business relationships with, Knox or Wintercap SA.

36. Between approximately December 26, 2017 and February 27, 2018, Gastauer caused WB21 US, Inc. and C Capital Corp to transfer approximately \$3.3 million to an individual I believe to be Gastauer's father, Raimund Gastauer, or accounts held for Raimund Gastauer's benefit.

37. Gastauer transferred approximately \$5.8 million to bank accounts in his own name from the proceeds of Wintercap SA's stock sales. Between approximately April 7, 2016 and July 6, 2017, Gastauer used his personal bank accounts in the U.S., which were funded by proceeds of Wintercap SA stock sales, to transfer, directly or indirectly, approximately \$736,000 to an individual I believe to be Gastauer's relative, Simone Gastauer Foehr, or accounts held for Simone Gastauer Foehr's benefit.

38. Also, between approximately March 2, 2018 and April 13, 2018, C Capital Corp and WB21 US, Inc. transferred approximately \$560,000 to B21 Ltd., an entity previously controlled by Gastauer.

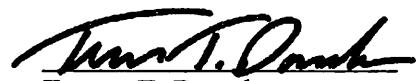
Ongoing Conduct

39. In or about September 2018, I reviewed trading activity by Wintercap SA, which is the subject of a recent referral of potential fraud to the Commission. The trading activity reflects that Wintercap SA sold the stock of two issuers and generated proceeds of approximately \$5 million in 2018. Although my analysis is ongoing, Wintercap SA's sale

this stock appears to be consistent with the Wintercap SA's stock sales in other issuers, including the stock sales I summarized above.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 2, 2018, in Boston, Massachusetts.



Trevor T. Donelan

EXHIBIT A

DWAC Instructions

Date: 5/2/2017 5/3/17 RICH'S APPROVAL ATTACHED
WMS A/C#: ██████████7572
FBO: SILVERTON SA APPROX : \$2,439,000
Requested by: ██████████ CLIENT NOTE: PLEASE USE "SILVERTON SA"
AS THE REFERENCE ON THE TRANSITION
OR THE TA WILL REJECT

Approved by: _____

- DEPOSIT

- WITHDRAWAL

Denise Roberts

From: [REDACTED]
Sent: Tuesday, May 02, 2017 10:08 AM
To: Rich Jablonski; ACS Credit
Cc: Prime OPS
Subject: FW: DWAC in: 2,622,675 EPTI
Attachments: 2017-05-02 EPTI DWAC AUTH form.pdf

Rich - Please approve a DWAC of 2,622,675 shares of Environmental Packaging Technologies Inc (EPTI, ISIN: US29408L1008) trades at 0.93 for:

Account# [REDACTED] 7572
Account Name: Silverton SA

This is a first party transfer as the stock is held in Silverton's name at the TA. I attach your DWAC auth checklist form also.

Credit – Please process, once approved.

You should use "Silverton SA" as the reference on the transition or the TA will reject. The TA cannot initiate this transfer.

FAST number:
50236
TA:
V Stock Transfer, LLC
Contact:
Ariel Lunar, ariel@vstocktransfer.com Phonc: (212) 828-8436

[REDACTED]
Vice President
WEBBUSH PRIVATE
142 W. 57th Street | New York | NY | 10019
(212) 806-8746
[REDACTED]@wedbush.com



hedgeweek
USA AWARDS WINNER 2016

From: [REDACTED]
Sent: Tuesday, May 02, 2017 11:09 AM
To: [REDACTED]
Subject: RE: DWAC in: 2,622,675 EPTI

ISIN: US29408L1008

Vice President
WEDBUSH PRIVATE
142 W. 57th Street | New York | NY | 10019
(212) 806-8746
[REDACTED]@wedbush.com



Businessweek
Lisa Weinstock WEINSTEIN

From: [REDACTED]
Sent: Tuesday, May 02, 2017 2:07 PM
To: [REDACTED]
Subject: RE: DWAC in: 2,622,675 EPTI

Hi Doreen,

I could be missing it, but I don't see a cusip...

Thanks,

[REDACTED]
213-688-6725 direct | 213-688-6720 main
[REDACTED]@wedbush.com

From: [REDACTED]
Sent: Tuesday, May 02, 2017 10:08 AM
To: Rich Jablonski; ACS Credit
Cc: Prime OPS
Subject: FW: DWAC in: 2,622,675 EPTI

Rich - Please approve a DWAC of 2,622,675 shares of Environmental Packaging Technologies Inc (EPTI, ISIN: US29408L1008) trades at 0.93 for:

From: Silverton Operations [mailto:operations@silverton.ch]
Sent: Tuesday, May 02, 2017 12:39 PM
To: [REDACTED]
Cc: Prime OPS
Subject: DWAC in: 2,622,675 EPTI

Dear Doreen,

Please initiate a DWAC of 2,622,675 shares of Environmental Packaging Technologies Inc (EPTI, ISIN: US29408L1008) for:

Account# [REDACTED] 7572

Account Name: Silverton SA

This is a first party transfer as the stock is held in Silverton's name at the TA. I attach your DWAC auth checklist form also.

Can you let me know when you have this set up in your system so I can tell the TA to look out for and match it.

You should use "Silverton SA" as the reference on the transition or the TA will reject. The TA cannot initiate this transfer.

Please also let me know when the stock has settled.

FAST number:

50236

TA:

V Stock Transfer, LLC

Contact:

Ariel Lunar, ariel@vstocktransfer.com Phone: (212) 828-8436

If you need any further information to process this DWAC, please let me know.

Regards,

Richard

[External Email]

Silverton SA - Operations
E: operations@silverton.ch
T: +41 (0) 27 768 2000
F: +41 (0) 22 594 8878

This email and any attachments are confidential and access to this email or attachments by anyone other than the addressee is unauthorised. If you are not the intended recipient please notify the sender and delete the email including any attachments. You must not disclose or distribute any of the contents to any other person.

WEDBUSH

Deposit Securities Request For Bulletin Board, Pink Sheet, and Unregistered Securities

Indicate Type: Physical Certificate Deposit DW-NCDRS Transfer from Issuer Other Transfer

Security Owner Questionnaire (TO BE COMPLETED BY THE SECURITY OWNER)

Security Owner Name: Silverton SA Account #: 7572 Occupation: Asset Manager

Shareholder Address: Route du Village 11, 1925 Fribourg, Switzerland

Security Description: US Equity

Issuer / Company Name: Environmental Packaging Technologies Inc (EPTI)

Issuer Address: 12303 Airport Way, Bremerton, WA 98337 USA Dealer Name: 1054 866 7366

1. Security Deposit Received (e.g., initial deposit) result: Yes No

2. How long have you been a client of Wedbush Securities: 6 months

3. Have you or any affiliated accounts deposited shares of this issue within the last 90 days? Yes No

If yes, please explain: I am the sole owner of this account and have deposited shares of EPTI into it.

4. Do you intend to deposit more shares in the future? Yes No If yes, how many:

5. Date Security was acquired: 23 April 2017

6. How were shares acquired? Explain: Prior to transaction

7. Was the Security acquired from the issuer? Yes No

8. Was the prior owner an officer, director, affiliate, controller, 10% holder of the securities at the time, or within 90 days of Owner's receipt of the security? Yes No

9. If yes to #8, please explain:

10. If gifted, indicate Prior Owner's purchase date, seller's name, and amount / number of payment:

11. Are you currently selling shares thru any other broker / under? Yes No

12. How many shares of the issuer are owned or controlled, directly or indirectly, by you? 0

13. How many shares, if any, have been sold by you? 0

14. How many shares have been purchased by, issued to, or transferred to, the shareholder within the last year? 2,622,675

15. Is the Security restricted from resale for any reason? Yes No

16. If yes to #15, what is the basis for the restriction?

17. When does the restriction end? _____
18. If restricted, may the shares be sold with prospectus before the end of the restrictive period? Yes No
19. If yes to #18, how soon? _____
20. Was the Security covered by a current registration statement when acquired? Yes No
21. If yes to #20, please explain and include type of registration (e.g., S-1, Form 20, etc.)
22. Was the Security exempt from SEC registration when you acquired it? Yes No
23. If yes to #22, describe exemption relied upon:
24. If a non-SEC reporting company, please list Officers and Affiliates:
25. Has the Issuer been through a recent name change? Yes No
26. If yes to #25, what was (or were) the previous name(s)?
27. Was Issuer a shell company when shares issued? Yes No
28. Is the corporate headquarters located in the same state that the shares were issued? Yes No
29. In which state were the shares issued?
30. Are you, or have you been, an officer, director, affiliate, control person or 5% owner of the Issuer? Yes No
31. If yes to #30, provide position and dates of duties held:
32. Are you, or any family member, a present or past officer, director, employee, control person, insider or large shareholder (10% or greater)? Yes No
If yes, please explain:
33. Percent (%) of total outstanding shares the shareholder holds: 9%
34. Have you made any payment to any other person in connection with the sale of the security? (e.g., commission):
 Yes No
35. Have you made any arrangements for buy orders in connection with the sale of the security?

36. Are there any stops or restrictions on shares? Yes No If yes, what is the type of stop or restriction?

37. If restricted, what sale harbor is being used to resell shares?

38. If free trading, are the shares registered? Yes No

39. If registered, type of registration (S-1, S-8, etc); fully up to date on OTC Markets.com

40. Is the registration statement effective? Yes No

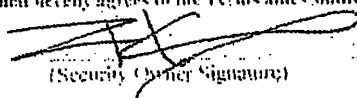
41. If not Registered, what sale harbor or exemption was used to create free trading shares or reach share?

42. Attach proof of exemption: Attached Yes No

43. Other information regarding the security deposit that you would like to provide:

The undersigned hereby represents that the information provided above is true and correct. The undersigned understands that Wedbush Securities Inc. will be relying on such information in determining whether to accept orders for the sale of the undersigned's securities. As condition to Wedbush Securities Inc.'s acceptance of any sale, the undersigned hereby agrees to the Terms and Conditions attached hereto.

Silverton SA
(Name/Title of Entity)


(Security Owner Signature)

02 MAY 17
(Date)

Thomas Kang

From: Rich Jablonski
Sent: Wednesday, May 03, 2017 9:41 AM
To: [REDACTED]
Cc: ACS Credit; Christina Castillo; Prime OPS
Subject: Re: DWAC in: 2,622,675 EPTI

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: URGENT

Approved

On May 3, 2017, at 11:24 AM, [REDACTED] <[REDACTED]@wedbush.com> wrote:

Hi Rich – Can you approve?

[REDACTED]
Vice President
<image001.gif>
142 W. 57th Street | New York | NY | 10019
(212) 806-8746
[REDACTED]@wedbush.com
<image002.jpg>

From: [REDACTED]
Sent: Tuesday, May 02, 2017 4:58 PM
To: Rich Jablonski; ACS Credit
Cc: Prime OPS
Subject: RE: DWAC in: 2,622,675 EPTI

Rich – Can you approve?

[REDACTED]
Vice President
<image001.gif>
142 W. 57th Street | New York | NY | 10019
(212) 806-8746
[REDACTED]@wedbush.com
<image002.jpg>

From: [REDACTED]
Sent: Tuesday, May 02, 2017 1:08 PM
To: Rich Jablonski; ACS Credit
Cc: Prime OPS
Subject: FW: DWAC in: 2,622,675 EPTI

Rich - Please approve a DWAC of 2,622,675 shares of Environmental Packaging Technologies Inc (EPTI, ISIN: US29408L1008) trades at 0.93 for:

Account# [REDACTED]7572

Account Name: Silverton SA

This is a first party transfer as the stock is held in Silverton's name at the TA. I attach your DWAC auth checklist form also.

Credit – Please process, once approved.

You should use “ Silverton SA ” as the reference on the transition or the TA will reject. The TA cannot initiate this transfer.

PAST number:

50236

TA:

V Stock Transfer, LLC

Contact:

Ariel Lunar, ariel@vstocktransfer.com Phone: (212) 828-8436

[REDACTED]
Vice President

<image001.gif>

142 W. 57th Street | New York | NY | 10019

(212) 806-8746

[REDACTED]@wedgebush.com

<image002.jpg>

From: Silverton Operations [mailto:operations@silverton.ch]

Sent: Tuesday, May 02, 2017 12:39 PM

To: [REDACTED]

Cc: Prime OPS

Subject: DWAC ln: 2,622,675 EPTI

Dear Doreen,

Please initiate a DWAC of 2,622,675 shares of Environmental Packaging Technologies Inc (EPTI, ISIN: US29408L1008) for:

Account# [REDACTED]7572

Account Name: Silverton SA

This is a first party transfer as the stock is held in Silverton's name at the TA. I attach your DWAC auth checklist form also.

Can you let me know when you have this set up in your system so I can tell the TA to look out for and match it.

You should use "Silverton SA" as the reference on the transition or the TA will reject. The TA cannot initiate this transfer.

Please also let me know when the stock has settled.

FAST number:

50236

TA:

V Stock Transfer, LLC

Contact:

Ariel Lunar, ariel@ystocktransfer.com Phone: (212) 828-8436

If you need any further information to process this DWAC, please let me know.

Regards,

Richard

[External Email]

Silverton SA - Operations

E: operations@silverton.ch

T: +41 (0) 27 768 2000

F: +41 (0) 22 594 8878

This email and any attachments are confidential and access to this email or attachments by anyone other than the addressee is unauthorised. If you are not the intended recipient please notify the sender and delete the email including any attachments. You must not disclose or distribute any of the contents to any other person.



Equity Authentication Form

Indicate Deposit Type: DWAC - DTC - DRs

Issuer Name: CURE Pharmaceutical Holding Corp
Issuer address: Larnakos Avenue, 73 ap. 402, Nicosia 1046, Cyprus
Issuer Phone number: +1(407)7205503 Issuer Contact Person: _____
Issuer Counsel: Carmel, Milazzo & DiChiara LLP Shares outstanding: 24,984,000
Transfer Agent: V Stock Transfer Transfer Agent Phone Number: (212) 828-8436 ext. 108
Transfer Agent Contact Person: Ariel Lunar
Account # Silverton SA SS# or Tax Id # Non-US company
Shareholder name: Silverton SA
Number of shares: 1,008,000
Symbol: CURR Cusip Number: 23127P104
Date of issuance: 11 Jul 2016 Total number of shares beneficially owned: 1,069,420

Shareholder Questionnaire

1. How and when were these shares acquired? Please provide supporting documentation
SPA

2. How many shares have been issued to, or transferred to, the Shareholder within the last year?
1,101,600

3. Is the Shareholder a present or past officer, director, affiliate, control person or 5% owner of the Issuer? **Yes / No**

If yes, please describe each position including the duties and dates the position was held.

4. Is any family member of the Shareholder a present or past officer, director, employee, control person, insider or large shareholder (10% or greater)? **Yes / No**

If yes, please describe each affiliation. _____

5. Has the Shareholder made any payment to any other person in connection with the sale of the security? (E.g. commission) **Yes / No**

6. Has the Shareholder made any arrangements for buy orders in connection with the sale of the security? **Yes / No**

Prior Owner Information

7. Please describe how these shares were acquired. (E.g. payment for services/compensation, Stock Offering, Note/Debt Conversion, Employment Agreement)

SPA

8. Please attach supporting documentation of acquisition if available. Such documentation includes copies of private placement memorandum, offering agreement, certain employee compensation documentation, debt agreement, convertible notes, or employee agreement.

List document attached: SPA

9. Was the Prior Owner an officer, director, affiliate, control or 10% holder of the securities at the time, or within 90 days of Owner's receipt of the security? **Yes / No**

If yes, describe the nature of the affiliation: _____

Restriction

10. Is the security restricted from resale for any reason? **Yes / No**

To avoid a possible violation of Section 5 of the Securities Act of 1933 (the "1933 Act"), the security must be either:

1. Registered in an offering (how / when registered): _____

Or:

2. Cleared under an exemption from registration (what exemption): _____

Unrestricted free trading stock from Transfer Agent

3. Any stops, holds, or additional lock-ups: **Yes / No** If yes, explain: _____

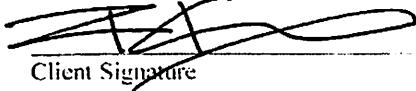
4. Is the security free of all encumbrances: **Yes / No** If no, explain: _____

5. Does current owner have anything to do with capitalizing the company, public relations or consulting: **Yes / No** If yes, explain: _____

6. Is the security part of an S-8 filing: **Yes / No**
If yes, when: Date security was acquired _____ from whom: _____

Shareholder Agreement

The undersigned hereby represents that the information provided above is true and correct. The undersigned understands that Tendall Capital Markets Ltd. will be relying on such information in determining whether to accept the undersigned's securities. As condition to Tendall Capital Markets Ltd's acceptance of any securities, the undersigned hereby agrees to the Terms and Conditions attached hereto:

Roger Knox
Client Name (Print)

Date: 15 Mar 2017
Client Signature

TERMS AND CONDITIONS

In consideration of Tendall Capital Markets Ltd. ("Tendall") accepting this Equity Authorization Form ("Questionnaire"), the Security Owner understands and agrees to each of the following:

1. The Security Owner agrees to keep the foregoing Questionnaire information up to date and current with Tendall as long as the Security shares are being sold.
2. The Security Owner agrees to indemnify and hold Tendall harmless from and against any and all claims, damages, liabilities and expenses which Tendall incurs as a result of or in connection with any inaccuracy or omission in the Security Owner's responses to the Questionnaire.
3. To cooperate with any internal or external audit or regulatory inquiry relating to this Questionnaire by providing any information or documentation reasonably requested by Tendall to support the information provided in the Questionnaire and any Security sale executed in accordance with the Securities Laws (as defined below). This obligation to cooperate will remain in effect before and after the completion of the transfer of the assets.
4. The acceptance of any sale of the related securities are expressly subject to the Security Owner's strict adherence to all applicable federal securities laws, including, without limitation, those described below (the "Securities Laws").

Selling Unregistered Securities: Federal securities law make it unlawful for a person to make use of any means or instrument of interstate commerce or of the mails to sell a security which has not been registered, or to deliver through the mail a security which has not been registered. Accordingly, unless a person can apply an exemption to its sales of securities, all securities sold are required to be registered pursuant to Section 5 of the Securities Act of 1933 (the "1933 Act").

Securities Fraud: Federal securities law make it unlawful for any person to offer or sell securities by the use of any means of interstate communication or transportation, including the mails, in order to employ a scheme to defraud to obtain money by omitting material information, or to engage in a course of business that would operate as a fraud on the purchaser.

Insider Trading: Federal securities law prohibits insider trading, which generally refers to buying or selling a security, on behalf of a fiduciary duty or other relationship of trust and confidence, while in possession of material, nonpublic information about the security. Insider trading violations may also include "tipping" such information, securities trading by the person "tipped," and securities trading by those who misappropriate such information.

Market Manipulation: Market manipulation describes a deliberate attempt to interfere with the free and fair operation of the market and create artificial, false or misleading appearances with respect to the price of, or market for, a security, commodity or currency. Market manipulation is prohibited under federal securities law. Market manipulation can occur in multiple ways, including:

Pools - Agreements: often written among a group of traders to delegate authority to a single manager to trade in a specific stock for a specific period of time and then to share in the resulting profits or losses. **Churning:** Placing both buy and sell orders at about the same price. The increase in activity is intended to attract additional investors, and increase the price.

Runs - Creating activity or rumors: in order to drive the price of a security up. This activity is usually referred to as "Painting the Tape." **Ramping (the market):** Actions designed to artificially raise the market price of listed securities and to give the impression of voluminous trading, in order to make a quick profit.

Wash sale: Selling and repurchasing the same or substantially the same security for the purpose of generating activity and increasing the price.

Bear raid: Attempting to push the price of a stock down by heavy selling or short selling.

Anti-Money Laundering: The Bank Secrecy Act (BSA) and its implementing regulations is a tool the U.S. government uses to fight drug trafficking, money laundering, and other crimes. Congress enacted the BSA to prevent banks and other financial service providers from being used as intermediaries for, or to hide the transfer or deposit of money derived from, criminal activity. Federal law makes money laundering a criminal act. Money laundering is the criminal practice of filtering ill-gotten gains or "dirty" money through a maze of series of transactions, so the funds are "cleaned" to look like proceeds from legal activities.

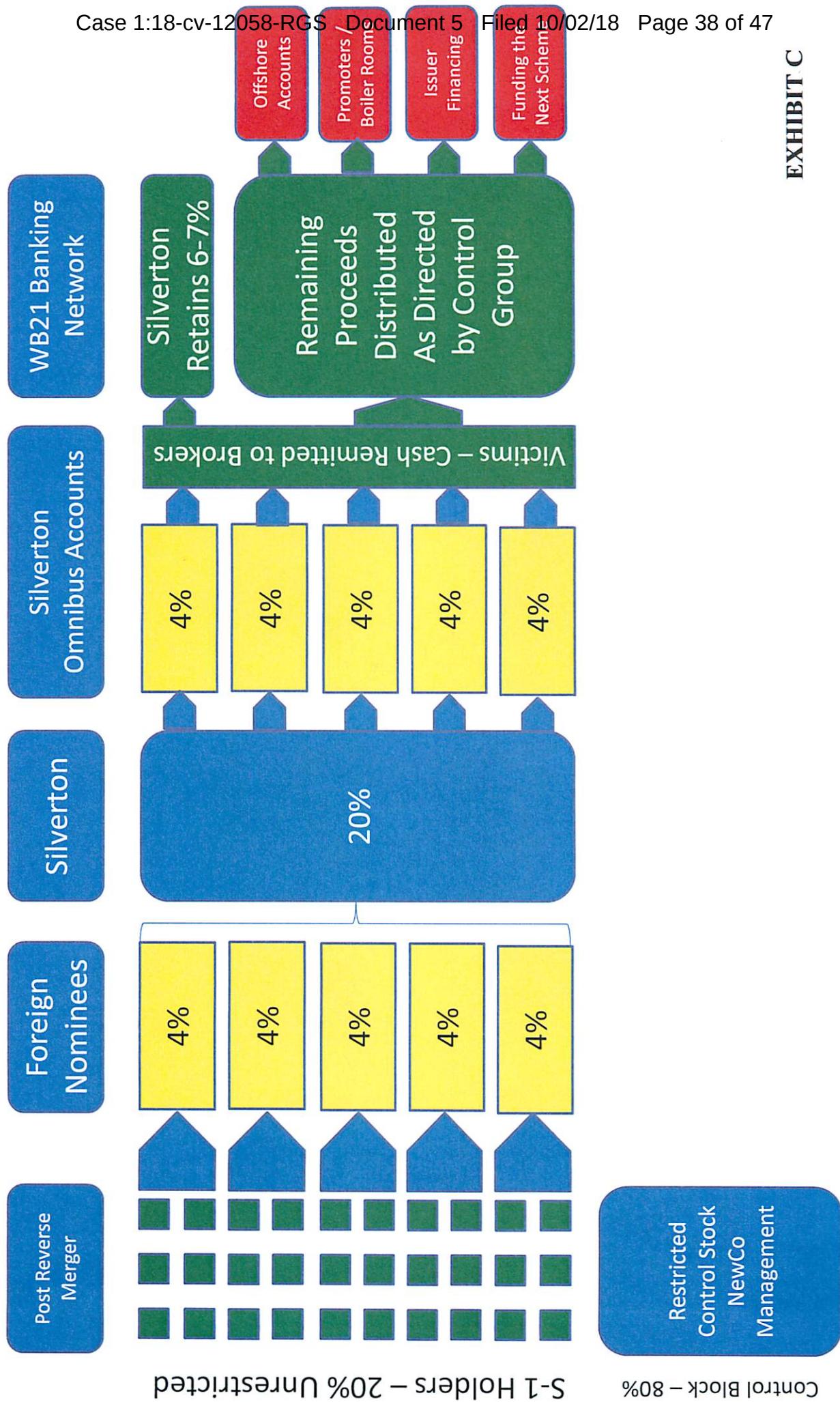


EXHIBIT D - SILVERTON FUNDS FLOW

WEDBUSH SECURITIES	LINEAR INVESTMENTS LTD	TENDALL CAPITAL	PROMETHEUS CAPITAL
(36,789,000) SILVERTON - CITI3963	(19,698,321) SILVERTON - CITI3963	(12,240,049) SILVERTON - CITI3963	(14,667,697) SILVERTON - AFRA9019
(5,166,000) SILVERTON - WF9757	(9,920,000) SILVERTON - BALTLV97	(5,179,720) SILVERTON - BALTLV97	(4,222,576) SILVERTON - CITI3963
(444,000) WINTERCAP - TD9280	(1,854,925) SILVERTON - AFRA9019	(3,978,780) SILVERTON - WF9757	(3,279,858) SILVERTON - WF9757
	(1,236,900) SILVERTON - WF9757	(2,126,900) WINTERCAP - TD9280	
	(750,000) SILVERTON - BALTLV76	(1,069,802) SILVERTON - AFRA9019	
	(112,236) SILVERTON - AFRA0024		
TOTAL	(42,399,000)	(33,572,383)	(22,170,131)
 VALBURY CAPITAL	 FORTE SECURITIES LTD	 FORTE SECURITIES LLC	 CANACCORD GENIUTY
(12,187,419) SILVERTON - CITI3963	(7,455,001) SILVERTON - BALTLV97	(4,889,000) SILVERTON - CITI3963	(5,245,361) WB21 - WF7434
(536,831) SILVERTON - AFRA9030	(3,874,527) SILVERTON - AFRA9019	(887,201) SILVERTON - WF9757	
(307,850) SILVERTON - AFRA0024			
TOTAL	(13,032,100)	(11,329,528)	(5,245,361)
 PETER PESIC	 APEX CLEARING CORP	 COWEN INTERNATIONAL	 HAYWOOD SECURITIES INC
(2,243,850) WB21 - WF7434	(1,250,000) SILVERTON - WF9757	(935,661) WB21 - CITI2788	(776,029) SILVERTON - BOM8405
(1,427,000) SILVERTON - WF9757			
(238,000) WINTERCAP - TD9280			
TOTAL	(3,908,850)	(1,250,000)	(776,029)
 TOTAL CASH FROM BROKERAGE FIRMS:	(164,990,495)		

SILVERTON SA CONTROLLED ACCOUNTS

	INFLOWS FROM BROKERAGE ACCOUNTS	INFLOWS FROM TRANSFERS	OUTFLOWS FROM TRANSFERS	SUMMARY BY ACCOUNT
SILVERTON SA BALTIKUMS BANK LATVIA	SILVERTON - BALTLV97 9,920,000 LINEAR INVESTMENTS LTD 7,455,001 FORTE SECURITIES LTD 5,179,720 TENDALL CAPITAL	SILVERTON - BALTLV97 750,000 SILVERTON - BALTLV76	SILVERTON - BALTLV97 (6,365,389) SILVERTON - BALTLV76 (3,659,892) WB21 - CITI2788 (2,540,810) SILVERTON - CITI13963 (1,688,625) SILVERTON - WF9757 (1,068,250) SILVERTON - MAU6642 (926,000) WB21 - WF7434 (645,000) SILVERTON - BOM0495 (7,662) SILVERTON - BOM8405	SILVERTON - BALTLV97 22,554,721 Inflows from Brokers 750,000 Inflows from Transfers (16,901,628) Outflows from Transfers 6,403,093 Net
	SILVERTON - BALTLV76 750,000 LINEAR INVESTMENTS LTD	SILVERTON - BALTLV76 6,365,389 SILVERTON - BALTLV97	SILVERTON - BALTLV76 (750,000) SILVERTON - BALTLV97 (945,024) SILVERTON - AFRA0013 (812,500) SILVERTON - MAU6642 (4,000) WB21 - WF7434	SILVERTON - BALTLV76 750,000 Inflows from Brokers 6,365,389 Inflows from Transfers (2,511,524) Outflows from Transfers 4,603,866 Net
SILVERTON SA AFRASIA BANK MAURITIUS	SILVERTON - AFRA9019 14,667,697 PROMETHEUS CAPITAL 3,874,527 FORTE SECURITIES LTD 1,854,925 LINEAR INVESTMENTS LTD 1,069,802 TENDALL CAPITAL	SILVERTON - AFRA9019 1,492,000 WB21 - CITI2788	SILVERTON - AFRA9019 (8,790,371) SILVERTON - AFRA9030 (3,384,940) WB21 - CITI2788 (2,759,670) SILVERTON - CITI13963 (882,420) SILVERTON - WF9757 (438,995) SILVERTON - AFRA9028 (305,000) WB21 - WF7434	SILVERTON - AFRA9019 21,466,951 Inflows from Brokers 1,492,000 Inflows from Transfers (16,561,395) Outflows from Transfers 6,397,556 Net
	SILVERTON - AFRA0024 307,850 VALBURY CAPITAL 112,236 LINEAR INVESTMENTS LTD	SILVERTON - AFRA0024	SILVERTON - AFRA0024	SILVERTON - AFRA0024 420,087 Inflows from Brokers - Inflows from Transfers - Outflows from Transfers 420,087 Net
	SILVERTON - AFRA9030 536,831 VALBURY CAPITAL	SILVERTON - AFRA9030 8,790,371 SILVERTON - AFRA9019	SILVERTON - AFRA9030 (99,970) SILVERTON - BOM0495 (5,000) WB21 - WF7434	SILVERTON - AFRA9030 536,831 Inflows from Brokers 8,790,371 Inflows from Transfers (104,970) Outflows from Transfers 9,222,232 Net
	SILVERTON - AFRA0013	SILVERTON - AFRA0013 945,024 SILVERTON - BALTLV76	SILVERTON - AFRA0013 (322,167) SILVERTON - BOM8405	SILVERTON - AFRA0013 - Inflows from Brokers 945,024 Inflows from Transfers (322,167) Outflows from Transfers 622,856 Net
	SILVERTON - AFRA9028	SILVERTON - AFRA9028 438,995 SILVERTON - AFRA9019	SILVERTON - AFRA9028	SILVERTON - AFRA9028 - Inflows from Brokers 438,995 Inflows from Transfers - Outflows from Transfers 438,995 Net

SILVERTON SA MAUBANK MAURITIUS	SILVERTON - MAU6642	SILVERTON - MAU6642	SILVERTON - MAU6642	SILVERTON - MAU6642
		1,068,250 SILVERTON - BALTLV97 812,500 SILVERTON - BALTLV76		- Inflows from Brokers 1,880,750 Inflows from Transfers - Outflows from Transfers 1,880,750 Net
SILVERTON SA BANK OF MONTREAL CANADA	SILVERTON - BOM8405	SILVERTON - BOM8405	SILVERTON - BOM8405	SILVERTON - BOM8405
	776,029 HAYWOOD SECURITIES INC	7,662 SILVERTON - BALTLV97 322,167 SILVERTON - AFRA0013		776,029 Inflows from Brokers 329,830 Inflows from Transfers - Outflows from Transfers 1,105,858 Net
	SILVERTON - BOM0495	SILVERTON - BOM0495	SILVERTON - BOM0495	SILVERTON - BOM0495
		645,000 SILVERTON - BALTLV97 99,970 SILVERTON - AFRA0930		- Inflows from Brokers 744,970 Inflows from Transfers - Outflows from Transfers 744,970 Net
TOTAL SILVERTON SA	46,504,619	21,737,328	(36,401,685)	

GASTAUER CONTROLLED ACCOUNTS

INFLOWS FROM BROKERAGE ACCOUNTS		INFLOWS FROM TRANSFERS		OUTFLOWS FROM TRANSFERS	
SILVERTON SA INC	SILVERTON - CITI3963	SILVERTON - CITI3963	SILVERTON - CITI3963	SILVERTON - CITI3963	SILVERTON - CITI3963
SILVERTON SA INC	SILVERTON - CITI3963	36,789,000 WEDBUSH SECURITIES 19,698,321 LINEAR INVESTMENTS LTD 12,240,049 TENDALL CAPITAL 12,187,419 VALBURY CAPITAL 4,889,000 FORTE SECURITIES LLC 4,222,576 PROMETHEUS CAPITAL	2,540,810 SILVERTON - BALTLV97 2,759,670 SILVERTON - AFRA9019 250,000 SILVERTON - JPMCS630	(96,896,303) WB21 - CITI2788 (3,801,000) WB21 - JPMC3753 (720,000) SILVERTON - JPMCS630	90,026,365 Inflows from Brokers 5,550,480 Inflows from Transfers (101,417,303) Outflows from Transfers (5,840,458) Net
	SILVERTON - WF9757	5,166,000 WEDBUSH SECURITIES 3,978,780 TENDALL CAPITAL 3,279,858 PROMETHEUS CAPITAL 1,427,000 PETER PESIC 1,250,000 APEX CLEARING CORP 1,236,900 LINEAR INVESTMENTS LTD 887,201 SILVERTON - WF9757	1,688,625 SILVERTON - BALTLV97 882,420 SILVERTON - AFRA9019 100,000 SILVERTON - JPMCS630	(8,337,519) WB21 - WF7434 (6,821,852) WB21NA - WF5546 (2,450,000) WB21 - JPMC3753 (1,700,000) SILVERTON - JPMCS630 (100,000) WB21 - CITI2788 (40,000) WB21 - JPMC2588 (20,000) CCC - CITI0409	17,225,739 Inflows from Brokers 2,671,045 Inflows from Transfers (19,469,370) Outflows from Transfers 427,413 Net
	SILVERTON - JPMCS630		SILVERTON - JPMCS630	(250,000) SILVERTON - CITI3963 (100,000) SILVERTON - WF9757 (1,750,000) WB21 - JPMC3753 (1,520,000) WB21 - CITI2788 (200,472) CCC - JPMC7228 (200,100) WB21NA - JPMC9118	- Inflows from Brokers 3,885,290 Inflows from Transfers (4,020,572) Outflows from Transfers (135,282) Net
WINTERCAP SA INC	WINTERCAP - TD9280	2,126,900 TENDALL CAPITAL 444,000 WEDBUSH SECURITIES 238,000 PETER PESIC	WINTERCAP - TD9280	(1,500,000) WINTERCAP - CITI0046	2,808,900 Inflows from Brokers - Inflows from Transfers (1,500,000) Outflows from Transfers 1,308,900 Net
	WINTERCAP - CITI0046		WINTERCAP - CITI0046	1,500,000 WINTERCAP - TD9280	(1,496,728) B2CAP - CITI17795
WB21 US INC	WB21 - WF7434	5,245,361 CANACCORD GENIUTY 2,243,850 PETER PESIC	WB21 - WF7434	WB21 - WF7434	WB21 - WF7434
		926,000 SILVERTON - BALTLV97 4,000 SILVERTON - BALTLV76 305,000 SILVERTON - AFRA9019 5,000 SILVERTON - AFRA9030 8,337,519 SILVERTON - WF9757 145,000 WB21 - JPMC3753 250,000 WB21NA - JPMC9118		(7,650,000) CCC - CITI0409 (4,250,000) WB21 - CITI2788 (4,048,250) WB21NA - WF5546 (350,000) WB21 - JPMC3753 (250,000) WB21NA - BOFA3021 (200,000) WB21NA - JPMC9118 (91,849) WB21NA - SBW1652	7,489,211 Inflows from Brokers 9,972,519 Inflows from Transfers (16,840,099) Outflows from Transfers 621,630 Net

WB21 - CITI2788	WB21 - CITI2788	WB21 - CITI2788	WB21 - CITI2788
935,661 COWEN INTERNATIONAL	3,659,892 SILVERTON - BALTLV97 3,384,940 SILVERTON - AFRA9019 96,896,303 SILVERTON - CITI3963 100,000 SILVERTON - WF9757 1,520,000 SILVERTON - JPMC5630 4,250,000 WB21 - WF7434 4,814,001 WB21 - JPMC3753	(1,492,000) SILVERTON - AFRA9019 (5,607,100) CCC - CITI0409 (950,000) WB21 - JPMC3753	935,661 Inflows from Brokers 114,625,136 Inflows from Transfers (8,049,100) Outflows from Transfers 107,511,697 Net
WB21 - JPMC3753	WB21 - JPMC3753	WB21 - JPMC3753	WB21 - JPMC3753
	3,801,000 SILVERTON - CITI3963 2,450,000 SILVERTON - WF9757 1,750,000 SILVERTON - JPMC5630 350,000 WB21 - WF7434 950,000 WB21 - CITI2788 50,000 WB21 - JPMC2588	(1,350,190) SILVERTON - JPMC5630 (145,000) WB21 - WF7434 (4,814,001) WB21 - CITI2788 (1,550,100) CCC - JPMC7228 (581,815) WB21NA - JPMC9118 (150,000) WB21NA - JPMC7773 (10,000) WB21 - JPMC2588	- Inflows from Brokers 9,351,000 Inflows from Transfers (8,601,106) Outflows from Transfers 749,894 Net
WB21 - JPMC2588	WB21 - JPMC2588	WB21 - JPMC2588	WB21 - JPMC2588
	40,000 SILVERTON - WF9757 10,000 WB21 - JPMC3753	(50,000) WB21 - JPMC3753	- Inflows from Brokers 50,000 Inflows from Transfers (50,000) Outflows from Transfers - Net
WB21 NA INC	WB21NA - WF5546	WB21NA - WF5546	WB21NA - WF5546
	6,821,852 SILVERTON - WF9757 4,048,250 WB21 - WF7434		- Inflows from Brokers 10,870,102 Inflows from Transfers - Outflows from Transfers 10,870,102 Net
WB21NA - JPMC9118	WB21NA - JPMC9118	WB21NA - JPMC9118	WB21NA - JPMC9118
	200,100 SILVERTON - JPMC5630 200,000 WB21 - WF7434 581,815 WB21 - JPMC3753 979 CCC - JPMC7228 550,191 WB21NA - JPMC7773	(65,000) SILVERTON - JPMC5630 (250,000) WB21 - WF7434 (400,000) WB21NA - JPMC7773 (305,000) CCC - JPMC7228 (276,400) WB21NA - SBW1652	- Inflows from Brokers 1,533,086 Inflows from Transfers (1,296,400) Outflows from Transfers 236,686 Net
WB21NA - BOFA3021	WB21NA - BOFA3021	WB21NA - BOFA3021	WB21NA - BOFA3021
	250,000 WB21 - WF7434 12,100 WB21NA - BOFA1703 5,000 WB21NA - SBW1652 80,000 WB21NA - TD8020	(334,351) WB21NA - BOFA1703	- Inflows from Brokers 347,100 Inflows from Transfers (334,351) Outflows from Transfers 12,749 Net
WB21NA - BOFA1703	WB21NA - BOFA1703	WB21NA - BOFA1703	WB21NA - BOFA1703
	334,351 WB21NA - BOFA3021	(12,100) WB21NA - BOFA3021 (322,251) WB21NA - TD8020	- Inflows from Brokers 334,351 Inflows from Transfers (334,351) Outflows from Transfers - Net

WB21NA - SBW1652	WB21NA - SBW1652	WB21NA - SBW1652	WB21NA - SBW1652
	91,849 WB21 - WF7434 276,400 WB21NA - JPMC9118 50,000 WB21NA - TD8020	(5,000) WB21NA - BOFA3021 (125,690) WB21NA - TD8020	- Inflows from Brokers 418,249 Inflows from Transfers (130,690) Outflows from Transfers 287,559 Net
WB21NA - JPMC7773	WB21NA - JPMC7773	WB21NA - JPMC7773	WB21NA - JPMC7773
	150,000 WB21 - JPMC3753 400,000 WB21NA - JPMC9118 100 CCC - JPMC0939	(550,191) WB21NA - JPMC9118	- Inflows from Brokers 550,100 Inflows from Transfers (550,191) Outflows from Transfers (91) Net
WB21NA - TD8020	WB21NA - TD8020	WB21NA - TD8020	WB21NA - TD8020
	125,690 WB21NA - SBW1652	(80,000) WB21NA - BOFA3021 (50,000) WB21NA - SBW1652 (140,000) WB21NA - TD8381	- Inflows from Brokers 125,690 Inflows from Transfers (130,000) Outflows from Transfers (4,310) Net
WB21NA - TD8381	WB21NA - TD8381	WB21NA - TD8381	WB21NA - TD8381
	322,251 WB21NA - BOFA1703 140,000 WB21NA - TD8020		- Inflows from Brokers 462,251 Inflows from Transfers - Outflows from Transfers 462,251 Net
C CAPITAL CORP	CCC - CITI0409	CCC - CITI0409	CCC - CITI0409
	20,000 SILVERTON - WF9757 7,650,000 WB21 - WF7434 5,607,100 WB21 - CITI2788 650,000 CCC - JPMC7228	(50,100) SILVERTON - JPMC5630 (979) WB21NA - JPMC9118 (650,000) CCC - CITI0409 (750,151) CCC - JPMC0939	- Inflows from Brokers 13,927,100 Inflows from Transfers - Outflows from Transfers 13,927,100 Net
	CCC - JPMC7228	CCC - JPMC7228	CCC - JPMC7228
	200,472 SILVERTON - JPMC5630 1,550,100 WB21 - JPMC3753 305,000 WB21NA - JPMC9118 750,073 CCC - JPMC0939	(50,100) SILVERTON - JPMC5630 (979) WB21NA - JPMC9118 (650,000) CCC - CITI0409 (750,151) CCC - JPMC0939	- Inflows from Brokers 2,805,645 Inflows from Transfers (1,451,230) Outflows from Transfers 1,354,415 Net
	CCC - JPMC0939	CCC - JPMC0939	CCC - JPMC0939
	750,151 CCC - JPMC7228	(750,073) CCC - JPMC7228 (100) WB21NA - JPMC7773	- Inflows from Brokers 750,151 Inflows from Transfers (750,173) Outflows from Transfers (22) Net
B2 CAP INC	B2CAP - CITI7795	B2CAP - CITI7795	B2CAP - CITI7795
	1,496,728 WINTERCAP - CITI0046		- Inflows from Brokers 1,496,728 Inflows from Transfers - Outflows from Transfers 1,496,728 Net
TOTAL GASTAUER	118,485,875	181,226,022	(166,561,665)
OVERALL TOTAL	164,990,495	202,963,349	(202,963,349)
			164,990,495 Inflows from Brokers 202,963,349 Inflows from Transfers (202,823,349) Outflows from Transfers

EXHIBIT E - LEGEND FOR BANK ACCOUNT CODES USED IN EXHIBIT F

Account Name	Financial Institution	Country	Account Number	Shorthand on Funds Flow
Silverton SA	Bank of Montreal	CANADA	0495 (USD)	SILVERTON - BOM0495
Silverton SA	Bank of Montreal	CANADA	8405 (CAD)	SILVERTON - BOM8405
Silverton SA	Baltikums Bank	LATVIA	0002 0	SILVERTON - BALTLV97
Silverton SA	Baltikums Bank	LATVIA	0001 0	SILVERTON - BALTLV76
Silverton SA	AfrAsia Bank	MAURITIUS	9019 (USD)	SILVERTON - AFRA9019
Silverton SA	AfrAsia Bank	MAURITIUS	9028 (CAD)	SILVERTON - AFRA9028
Silverton SA	AfrAsia Bank	MAURITIUS	9030 (USD)	SILVERTON - AFRA9030
Silverton SA	AfrAsia Bank	MAURITIUS	0013 (CHF)	SILVERTON - AFRA0013
Silverton SA	AfrAsia Bank	MAURITIUS	0024 (EUR)	SILVERTON - AFRA0024
Silverton SA	MauBank	MAURITIUS	6642 (USD)	SILVERTON - MAU6642
B2 Cap, Inc.	Citibank	US	7795	B2CAP - CITI7795
C Capital Corp	Citibank	US	0409	CCC - CITI0409
C Capital Corp	JP Morgan Chase	US	7228	CCC - JPMC7228
C Capital Corp	JP Morgan Chase	US	0939	CCC - JPMC0939
Silverton S.A., Inc.	Citibank	US	3963	SILVERTON - CITI3963
Silverton S.A., Inc.	JP Morgan Chase	US	5630	SILVERTON - JPMC5630
Silverton S.A., Inc.	Wells Fargo	US	9757	SILVERTON - WF9757
WB21 N.A., Inc.	Bank of America	US	3021	WB21NA - BOFA3021
WB21 N.A., Inc.	Bank of America	US	1703	WB21NA - BOFA1703
WB21 N.A., Inc.	JP Morgan Chase	US	9118	WB21NA - JPMC9118
WB21 N.A., Inc.	JP Morgan Chase	US	7773	WB21NA - JPMC7773
WB21 N.A., Inc.	Savings Bank of Walpole	US	1652	WB21NA - SBW1652
WB21 N.A., Inc.	TD Bank	US	8020	WB21NA - TD8020
WB21 N.A., Inc.	TD Bank	US	8381	WB21NA - TD8381
WB21 N.A., Inc.	Wells Fargo	US	5546	WB21NA - WF5546
WB21 US, Inc.	Citibank	US	2788	WB21 - CITI2788
WB21 US, Inc.	JP Morgan Chase	US	3753	WB21 - JPMC3753
WB21 US, Inc.	JP Morgan Chase	US	2588	WB21 - JPMC2588
WB21 US, Inc.	Wells Fargo	US	7434	WB21 - WF7434
Wintercap SA, Inc.	Citibank	US	0046	WINTERCAP - CITI0046
Wintercap SA, Inc.	TD Bank	US	9280	WINTERCAP - TD9280

EXHIBIT E - LEGEND FOR BANK ACCOUNT CODES USED IN EXHIBIT D

Account Name	Financial Institution	Country	Account Number	Shorthand on Funds Flow
Silverton SA	Bank of Montreal	CANADA	0495 (USD)	SILVERTON - BOM0495
Silverton SA	Bank of Montreal	CANADA	8405 (CAD)	SILVERTON - BOM8405
Silverton SA	Baltikums Bank	LATVIA	0002 0	SILVERTON - BALTLV97
Silverton SA	Baltikums Bank	LATVIA	0001 0	SILVERTON - BALTLV76
Silverton SA	AfrAsia Bank	MAURITIUS	9019 (USD)	SILVERTON - AFRA9019
Silverton SA	AfrAsia Bank	MAURITIUS	9028 (CAD)	SILVERTON - AFRA9028
Silverton SA	AfrAsia Bank	MAURITIUS	9030 (USD)	SILVERTON - AFRA9030
Silverton SA	AfrAsia Bank	MAURITIUS	0013 (CHF)	SILVERTON - AFRA0013
Silverton SA	AfrAsia Bank	MAURITIUS	0024 (EUR)	SILVERTON - AFRA0024
Silverton SA	MauBank	MAURITIUS	6642 (USD)	SILVERTON - MAU6642
B2 Cap, Inc.	Citibank	US	7795	B2CAP - CITI7795
C Capital Corp	Citibank	US	0409	CCC - CITI0409
C Capital Corp	JP Morgan Chase	US	7228	CCC - JPMC7228
C Capital Corp	JP Morgan Chase	US	0939	CCC - JPMC0939
Silverton S.A., Inc.	Citibank	US	3963	SILVERTON - CITI3963
Silverton S.A., Inc.	JP Morgan Chase	US	5630	SILVERTON - JPMC5630
Silverton S.A., Inc.	Wells Fargo	US	9757	SILVERTON - WF9757
WB21 N.A., Inc.	Bank of America	US	3021	WB21NA - BOFA3021
WB21 N.A., Inc.	Bank of America	US	1703	WB21NA - BOFA1703
WB21 N.A., Inc.	JP Morgan Chase	US	9118	WB21NA - JPMC9118
WB21 N.A., Inc.	JP Morgan Chase	US	7773	WB21NA - JPMC7773
WB21 N.A., Inc.	Savings Bank of Walpole	US	1652	WB21NA - SBW1652
WB21 N.A., Inc.	TD Bank	US	8020	WB21NA - TD8020
WB21 N.A., Inc.	TD Bank	US	8381	WB21NA - TD8381
WB21 N.A., Inc.	Wells Fargo	US	5546	WB21NA - WF5546
WB21 US, Inc.	Citibank	US	2788	WB21 - CITI2788
WB21 US, Inc.	JP Morgan Chase	US	3753	WB21 - JPMC3753
WB21 US, Inc.	JP Morgan Chase	US	2588	WB21 - JPMC2588
WB21 US, Inc.	Wells Fargo	US	7434	WB21 - WF7434
Wintercap SA, Inc.	Citibank	US	0046	WINTERCAP - CITI0046
Wintercap SA, Inc.	TD Bank	US	9280	WINTERCAP - TD9280

EXHIBIT F

[04/10/2016 22:00:49] [REDACTED]: EOD on its way thank you all. GN.

[04/10/2016 22:01:09] Roger Knox: thx, night

[05/10/2016 15:15:51] [REDACTED]: Afternoon everyone

[05/10/2016 15:54:08] Roger Knox: hi

[05/10/2016 15:54:14] tendall capital: hey there

[05/10/2016 16:48:45] Silverton SA: Guys, any news yet on if you can take in the names mentioned yesterday via DWAC?

[05/10/2016 16:50:03] [REDACTED]: I will call you shortly

[05/10/2016 16:50:16] Silverton SA: just type on here pls so R can see also

[05/10/2016 16:55:10] [REDACTED]: We cannot deposit it at Fidelity. We made an inquiry with Linear but no word as of yet. We can try at Alpine and I can send you their DD questionnaire for your consideration.

[05/10/2016 16:55:35] Roger Knox: who's account at Alpine?

[05/10/2016 16:56:03] [REDACTED]: This is regarding SRUP. We have an account with Alpine

[05/10/2016 16:56:13] Roger Knox: most each and every BO be identified?

[05/10/2016 16:56:25] Roger Knox: must...

[05/10/2016 16:56:55] Roger Knox: or if position renamed into Silverton, will then accept us?

[05/10/2016 17:00:48] [REDACTED]: Hi Roger, let me give them a quick call to clarify as your situation is unique in a sense that you have clients put position in your name first. As Cayman Securities (branch of Alpine) also requires our clients to put the stock in their name when sent via dwac.

[05/10/2016 17:01:58] Roger Knox: ok, thx, appreciated

[05/10/2016 17:02:24] Roger Knox: my client may as well go direct, as I would be unable to add value

[05/10/2016 17:08:48] [REDACTED]: Just clarified, the name change into Caymans only applies with physicals and not dwac. They need to know who the UBO is, which you can fill all the info out, you will just need your clients signature

[05/10/2016 17:09:11] [REDACTED]: Would you like me to send you the paper work just to have an idea of what we are talking about? Pretty standard stuff

[05/10/2016 17:14:24] Roger Knox: please do

[05/10/2016 22:00:37] [REDACTED]: Good night.

[05/10/2016 22:12:56] Roger Knox: bye

[06/10/2016 12:34:19] Roger Knox: Good day

[06/10/2016 12:34:37] Roger Knox: DWAC status, can we proceed to instruct CATQ please?